



April 9, 2003

The Honorable Ann Veneman  
Secretary, U.S. Department of Agriculture  
Country of Origin Labeling Program  
Agricultural Marketing Service  
Stop 0249 Room 2092-S  
1400 Independence Avenue, SW  
Washington, DC 20250-0249

**Re: Comments on Guidelines for Voluntary Country of Origin Labeling Program**

Dear Secretary Veneman:

I am the Group Vice President of Grocery for Schnuck Markets, Inc. As such, I am directly responsible for all frozen food products and peanuts – two items falling within the Country of Origin labeling requirements.

Schnuck Markets operates 100 stores in Missouri, Illinois, Indiana, Wisconsin, Tennessee and Mississippi. Each store typically carries over 30 SKU's of peanuts, 20 SKU's of frozen fruit and 225 SKU's of frozen vegetables on a daily basis. Our products are sourced from many countries throughout the world to ensure that consumers have high quality products at an affordable price throughout the year. The task of identifying the country of origin as required by the law for all of these products is enormous. We cannot look at a handful of peanuts and identify the country of origin of the product. You must require our suppliers to provide us with that information and to implement systems – such as verifiable segregation plans – to ensure that the information that we receive is accurate; we must be able to rely on the information that our suppliers provide.


As you develop the regulations, please consider the following:

- Hold suppliers who are responsible for peanuts and frozen fruits and vegetables at the growing, packing and processing stages accountable for providing accurate information on the countries in which each stage of production occurs;
- Provide for flexible means of informing consumers of the country of origin of peanuts and frozen fruits and vegetables at retail; and
- Implement reasonable recordkeeping requirements.

Please issue regulations that will allow us to comply with the law without limiting our ability to continue to provide consumers with a fresh and abundant produce supply.

Sincerely,

Rick Frede  
Group Vice President of Grocery  
Schnuck Markets, Inc.



SCHNUCK MARKETS, INC., 11420 LACKLAND RD., P.O. BOX 46928, ST. LOUIS, MO 63146-6928 (314) 994-9900

TOTAL P.01